

WP 07-65

SECTION BUR.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

2007 MAR 22 P 6: 21

In the Matter of)
)
Section 63.71 Application of)
SBC Long Distance, LLC d/b/a AT&T)
Long Distance)
)
For Authority Pursuant to Section 214 of)
The Communications Act of 1934, As Amended,)
To Discontinue the Provision of Service)

File No.

RECEIVED

FILED/ACCEPTED

MAR 20 2007

Federal Communications Commission
Office of the Secretary

**SECTION 63.71 APPLICATION OF SBC LONG DISTANCE, LLC. d/b/a
AT&T LONG DISTANCE**

SBC Long Distance, LLC, d/b/a AT&T Long Distance Service ("AT&T"), applies for authority under Section 214(a) of the Communications Act, as amended ("the Act"), 47 U.S.C. § 214, and Section 63.71 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §63.71, to discontinue the following business services: Local Business Access Lines, Intrastate Private Line, Local Primary Rate ISDN (PRI), Local Digital Trunks (DTS), and Local T-1 Integrated Access (IAS) in the District of Columbia, Kentucky, Massachusetts, Maryland, North Carolina, New Jersey, New York, Oregon, Pennsylvania, Tennessee, Virginia, and Washington.

As required by Section 63.71(a) and (b) of the Commission's rules, AT&T is providing the following information:

Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):

SBC Long Distance, LLC, d/b/a AT&T Long Distance
1010 N Saint Mary's Street, #13L
San Antonio, TX 78215

Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

In all affected states except Oregon, AT&T will no longer offer these services to new customers on or after May 1, 2007, subject to Commission authorization of the discontinuance pursuant to 47 C.F.R. § 63.71(c). In Oregon, AT&T will no longer offer these services to new customers on or after May 15, 2007, subject to Commission authorization of the discontinuance pursuant to 47 C.F.R. § 63.71(c).

AT&T will continue to provide services to its existing customers until their existing contracts expire or are terminated.

Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), b(2)):

AT&T will discontinue these services in the District of Columbia, Kentucky, Massachusetts, Maryland, North Carolina, New Jersey, New York, Oregon, Pennsylvania, Tennessee, Virginia, and Washington.

Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(3), b(2)):

1. Business Direct Access Line Service (also known sold in packages referred to as Phone Solutions and Phone Solutions Plus) allows customers to place outbound calls to terminating domestic and international locations originating in the United States via switched or dedicated origination. Customers must dial "1+" the area code or country code and the number.

2. Intrastate Private Line Service provides customers with a dedicated path between two or more customer premises facilities within the same LATA.

3. Primary Rate ISDN(PRI) Service provides communications using Integrated Service Digital Network (ISDN) Primary Rate Interface (PRI) technology. This service employs a 1.544 Megabits per second (Mbps) facility typically divided into twenty-three B Channels and one D Channel. The B Channels are used for circuit-switched voice and data communications connecting to the public switched telephone network (PSTN) while the D Channel provides out-of-band signaling.

4. Digital Trunks (DTS) is a digital connection from the AT&T central office to the customer's PBX that handles as many as 24 digital voice or data channels. DTS uses the digital technology in the PBX to produce a digital signal to the central office and through the public telephone network. DTS simply supplies a digital local loop from the PBX to the central office without carrying the characteristic features normally gained from digital technology (e.g., Caller ID).

5. T-1 Integrated Access (IAS) is a service that allows a customer to combine both Local Business Access Line service and Internet access on a single shared T-1 circuit.

As a result of the acquisition of AT&T Corp. and its subsidiaries by SBC Communications Inc., the combined entity is streamlining their business services portfolio. If this Application is approved, the services described above, currently provided by AT&T, will be provided by another affiliate of AT&T.

The public convenience and necessity will not be impaired by this service discontinuance because there are many alternative providers of business services, including but not limited to AT&T Corp., Access Point, Inc., Birch Telecom, Talk America and Verizon.¹ Furthermore, none of the affected customers should experience a loss in service as AT&T plans to offer a comparable suite of services to these customers through another AT&T affiliate.

Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3)):

AT&T notified customers of its intention to discontinue these services by letter sent via U.S. Mail on March 15, 2007. A sample of the letters is attached hereto as Attachment A.

¹ For example, Access Point Inc. provides business services in Washington, D.C., Massachusetts, Maryland, New Jersey, New York, and Pennsylvania; Birch Telecom provides services in Kentucky and Tennessee; Talk America provides services in Oregon, Virginia, and Washington; Verizon providers services in Washington, D.C., Massachusetts, Maryland, and Virginia.

Copies of this Application are being sent, first class U.S. Mail, to the public utilities commission and governor of each state in which discontinuance is proposed and also to the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.

Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

AT&T is considered non-dominant with respect to the services to be discontinued. Questions about this application may be addressed to Toni Acton, AT&T Services, Inc., Director – Federal Regulatory, 1120 20th Street, NW, Suite 1000, Washington, DC 20036, (202) 457-3039.

Conclusion:

The public convenience and necessity will not be adversely affected by the discontinuance of this service since there are alternative providers of business services and AT&T will offer comparable services through another AT&T affiliate.

AT&T respectfully requests that the Commission approve its Section 63.71 Application to discontinue the business services discussed above.

Respectfully submitted,

By: 

Terri L. Hoskins
Gary L. Phillips
Paul K. Mancini

AT&T Inc.
1120 20th Street, N.W.
Washington, D.C. 20036

(202) 457-3047 – Tel. No.
(202) 457-3073 – Fax. No.

Its Attorneys

March 20, 2007

Attachment A



AT&T Long Distance
1010 N Saint Mary's Street, #13L
San Antonio TX 78215-2109

March 15, 2007

Re: Important information regarding your local service from SBC Long Distance, LLC,
d/b/a AT&T Long Distance.

As you know, in November 2005, SBC Communications Inc. joined with AT&T Corp. and formed AT&T Inc. As part of the integration process, the affiliated companies are streamlining their business service portfolios. As a result, effective May 15, 2007, pending regulatory approval, several local telephone service offerings by AT&T Long Distance are being phased out, and comparable local services will continue to be provided by one of AT&T Inc.'s affiliated companies.

The local services in Oregon from AT&T Long Distance affected by this action are:

- Local Business Access Lines, Phone Solutions and Phone Solutions Plus
- Local Intrastate Private Line
- Local Primary Rate ISDN (PRI)
- Local Digital Trunks (DTS)
- Local T-1 Integrated Access (IAS)

Note: Other AT&T Long Distance services are not affected by this notice and action

Our records indicate that you currently have one or more of the services impacted by this change. AT&T values your business and looks forward to continuing to meet your telecommunications needs by offering comparable services – with no installation charges – at equally competitive rates. No action is required at this time – an AT&T account representative will be contacting you to ensure that you are obtaining the most suitable replacement services for your needs, and to plan for a smooth transition of service.

All existing AT&T Long Distance local service customers of record as of May 15, 2007, and customers who have signed a contract or letter of intent on or before that date, will be provided service under the terms and conditions in effect on that date. These terms and conditions will apply until such time as the service is disconnected.

On or after May 15, 2007 subsequent changes to existing service may be made at the terms and conditions in effect when the order is placed. Pending regulatory approval, no orders for service from new customers or moves and additions to existing service will be accepted after May 15, 2007.

(continued)

Please do not send inquiries or payments to the return address on this notice. If you have comments or questions, please contact AT&T Customer Service at the toll-free number on your bill.

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service, or a reasonable substitute, from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of SBC Long Distance, LLC, d/b/a AT&T Long Distance. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

We value you as our customer and look forward to continuing to meet your telecommunications service needs. Please contact your AT&T Account Manager or AT&T at (877) 430-7228 if you have any questions regarding this matter.

Sincerely,

AT&T Long Distance



AT&T Long Distance
1010 N Saint Mary's Street, #13L
San Antonio TX 78215-2109

March 15, 2007

Re: Important information regarding your local service from SBC Long Distance, LLC,
d/b/a AT&T Long Distance.

As you know, in November 2005, SBC Communications Inc. joined with AT&T Corp. and formed AT&T Inc. As part of the integration process, the affiliated companies are streamlining their business service portfolios. As a result, effective May 1, 2007, pending regulatory approval, several local telephone service offerings by AT&T Long Distance are being phased out, and comparable local services will continue to be provided by one of AT&T Inc.'s affiliated companies.

The local services in Maryland from AT&T Long Distance affected by this action are:

- Local Business Access Lines, Phone Solutions and Phone Solutions Plus
- Local Intrastate Private Line
- Local Primary Rate ISDN (PRI)
- Local Digital Trunks (DTS)
- Local T-1 Integrated Access (IAS)

Note: Other AT&T Long Distance services are not affected by this notice and action

Our records indicate that you currently have one or more of the services impacted by this change. AT&T values your business and looks forward to continuing to meet your telecommunications needs by offering comparable services – with no installation charges – at equally competitive rates. No action is required at this time – an AT&T account representative will be contacting you to ensure that you are obtaining the most suitable replacement services for your needs, and to plan for a smooth transition of service.

All existing AT&T Long Distance local service customers of record as of May 1, 2007, and customers who have signed a contract or letter of intent on or before that date, will be provided service under the terms and conditions in effect on that date. These terms and conditions will apply until such time as the service is disconnected.

On or after May 1, 2007 subsequent changes to existing service may be made at the terms and conditions in effect when the order is placed. Pending regulatory approval, no orders for service from new customers or moves and additions to existing service will be accepted after May 1, 2007.

(continued)

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We value you as our customer and look forward to continuing to meet your telecommunications service needs. Please contact your AT&T Account Manager or AT&T at (877) 430-7228 if you have any questions regarding this matter.

Sincerely,

AT&T Long Distance

CERTIFICATE OF SERVICE

I do certify that I have, this 20th day of March 2007, served a copy of the foregoing
Section 63.71 Application by U.S. Mail postage prepaid to the following:

Public Service Commission of the District of
Columbia
1333 H Street, NW
Suite 200, West Tower
Washington, DC 20005

Secretary of Defense
Attn: Special Asst. for Telecommunications
Pentagon
Washington, D.C. 20301

Governor Ernie Fletcher
700 Capital Avenue
Suite 100
Frankfort, KY 40601

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602-0615

Governor Deval Patrick
Office of the Governor
Room 360
Boston, MA 02133

Office of Consumer Affairs and Business
Regulation
10 Park Plaza, Suite 5170
Boston, MA 02116

Maryland Public Service Commission
William D. Schaefer Tower
6 St. Paul Street, 12th Floor
Baltimore, MD 21202

Governor Martin J. O'Malley
State House, 100 State Circle,
Annapolis, MD 21401 - 1925

North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918

Governor Michael F. Easley
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Governor Jon Corzine
PO Box 001
Trenton, NJ 08625 609-292-6000

New Jersey Board of Public Utilities
Two Gateway Center
Newark, NJ 07102

Office of the Governor
633 3rd Ave # 38
New York, NY 10017

New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Governor Ted Kulongoski
160 State Capitol
900 Court Street
Salem, OR 97301-4047

Public Utility Commission of Oregon
550 Capitol St NE #215
PO Box 2148
Salem OR 97308-2148

Governor Edward G. Rendell's Office
225 Main Capitol Building
Harrisburg, PA 17120

Public Utility Commission
400 North Street
Keystone Bldg.
Harrisburg, PA 17120

Governor Phil Bredesen
Governor's Office
Tennessee State Capitol
Nashville, TN 37243-0001

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Virginia State Corporation Commission
Tyler Building,
1300 E. Main Street
Richmond, VA 23219

Governor Tim Kaine
Office of the Governor
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, VA 23219

Governor Chris Gregoire
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Washington Utilities and Transportation
Commission
PO Box 47250
Olympia, WA 98504-7250

/s/ Dionne Rothwell
Dionne Rothwell